

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ADMI INC, TARSIN MOBILE INC., by their CEO,  
JOSEPH R, CELLURA and JOSEPH R. CELLURA,  
Individually,

Plaintiffs,

VS.

ALLEN D. MOYER and ADMI INCORPORATED,

Defendants.

**Case No.: Number: 22-cv-2022**

**PLAINTIFFS' MOTION FOR A TEMPORARY  
RESTRAINING ORDER AND FOR A HEARING  
GRANTING A PRELIMINARY INJUNCTION**

**COMES NOW** Plaintiffs ADMI Inc., (“ADMI-NV”), Tarsin Mobile Inc., (“TMIX”) and Joseph R. Cellura (“Cellura”) by and through their counsel of record, as and for their filed Complaint of November 1, 2022, against, Allen D. Moyer (“Moyer”) and ADMI Incorporated (“ADMI-CA”) for past and continuing acts of Intentional Interference with Prospective Business Advantage-Coercion, Civil Extortion, Defamation Per Se., Intentional Infliction of Emotional Distress, and Injunctive Relief. Defendant Moyer’s conduct has already impaired Plaintiffs contractual rights among them their business relationships, their potential relationships and their Strategic Partners by reason of the Defendant Moyer’s completed acts of wrongdoing and his continuing threats to do so in the future.

For the reasons set forth in the Complaint Exhibit “A” and by Declaration of Plaintiff Joseph R. Cellura, Exhibit “B”, this Court may act under Rule 65 of the Federal Rules of Civil Procedure to enter a Temporary Restraining Order and grant a hearing for a Preliminary Injunction enjoining Defendant Moyer individually, as Chief Executive Officer (“CEO”) of ADMI-CA, and all persons acting on behalf of the Defendants, from interfering delaying or otherwise acting to destroy, the business operations of Plaintiffs associated with their Strategic and national Partners pending entry by the Court of a final judgment in this action.

This motion is based on the following grounds:

1. On November 1, 2022, Plaintiffs filed a Verified Complaint ("complaint") alleging Defendant Moyer's Intentional Interference with prospective Business Advantage-coercion-civil extortion of ADMI-NV and TMIX, a publicly traded company listed on the OTC. The Complaint also alleges individual claims on behalf of Plaintiff Cellura for Defamation Per Se, Intentional Infliction of Emotional Distress, and Injunctive Relief. Unless enjoined by this Court, Defendant Moyer will, as he has in the past, disrupt the operations of AMDI-NV and TMIX causing it to cease operations with its Strategic Partners and others. Solely by his unlawful conduct, there will be a loss to the public, private investors and shareholders of the Plaintiff Companies.

2. The Defendant Moyer has stated publicly as part of his unlawful strategy his intent to extort money and other valuable property from Plaintiffs, he will bankrupt the Plaintiff Companies by forcing them to endure endless litigation whether the claims are true or not, putting an end to, and otherwise destroying Plaintiffs business relationships with their Strategic Partner and other business partners as well as the destroy the shareholders and noteholders investments in these Companies.

3. Pursuant to Rule 65(a)(1) of the Federal Rules of Civil Procedure, counsel for the Plaintiffs respectfully certifies to the Court that on October 21, 2022, Counsel attempted to serve a Notice to Cease and Desist on the Defendant Moyer and ADMI-CA, advising him of his past wrongful acts which was refused. Since then, Defendant has frantically and deliberately stepped up his threats to destroy the Plaintiff Companies demanding money and stock in ADMI-NV and TMIX. There is no lawful basis for his demand except to as he has stated "destroy" Plaintiffs business.

4. There is a substantial likelihood that Plaintiff will establish their claims at trial.

5. A Temporary Restraining Order is necessary to preserve the status quo, to prevent the irreparable injury to the Plaintiffs and the public that would result from the interference and destruction of the operations of the Plaintiff Companies. If the Defendant Moyer is not restrained

no effective relief will remain if the Plaintiff prevails at trial. Plaintiff would have no adequate remedy at law, because money damages will not address the harm to Plaintiffs ADMI-NV and TMIX investor-shareholders and Plaintiff Cellura as to their reputations and business standing, leaving this Court's ability to fashion effective relief significantly impaired.

6. Any harm to Defendants Moyer or ADMI-CA from enjoining their conduct would be outweighed by the actual and potential economic harm and effects resulting to the contracts and subcontracts under the Licensing Agreement with their strategic partners.

7. Granting the requested preliminary relief will serve the public interest.

8. This Court has authority in this matter pursuant to Rule 65(a)(1), 28 U.S.C. §§ 1332 in that there exists complete diversity of citizenship among the parties with the amount in controversy exceeding the sum of \$75,000.00, where the harm to Plaintiff has occurred and will occur in this District such that venue is proper under 28 U.S.C. § 1391(b) and concerns to state court matters of supplemental jurisdiction pursuant to 28 U.S.C. § 1367, authorizing it to issue the requested preliminary relief.

9. Plaintiff will post a bond as directed by the Court.

10. This Motion is supported by a concurrently filed Memorandum of Plaintiffs in Support of their Motion for a Temporary Restraining Order and Preliminary Injunction hearing together with a supporting declaration of Plaintiff Joseph R. Cellura.

**WHEREFORE**, the Plaintiffs seek relief that the Defendants and all persons acting on its behalf be enjoined from interfering, delaying, and destroying the operations of ADMI-NV and TMIX pending entry by the Court of a final judgment in this action.

Dated: November 3, 2022

Respectfully submitted,

*Douglas R. Dollinger, Esq.*

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